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FRAUD INDICATORS SUMMARY

Siskiyou County MHSA Prevention & Early Intervention Program

Schlieter v. County of Siskiyou | Case No. 24CV12876

Prepared for Litigation Team Review | March 2026

Purpose of This Document

This memorandum identifies and analyzes **twelve fraud indicators** derived from cross-analysis of Siskiyou County's MHSA Annual Revenue and Expenditure Reports (ARERs), the BHSOAC state-filed FY 2023/24 Revenue and Expenditure Report, MHSA planning documents, and Board of Supervisors records. Indicators are organized by tier: Tier 1 (strongest evidence of intentional misconduct), Tier 2 (material financial anomalies warranting expert analysis), and Tier 3 (governance failures that enabled or concealed the above).

The pattern across all twelve indicators is consistent with a scheme in which: (1) a whistleblower with procurement oversight authority was removed, (2) procurement accountability mechanisms were systematically dismantled, (3) the documentary record for the highest-exposure fiscal year was suppressed or destroyed, and (4) expenditure escalation occurred under the control of the same administrator who certifies expenditures to the state. No single indicator is dispositive; taken together, they describe a system designed to prevent detection.

PART 1: INDICATOR OVERVIEW

ID	Tier	Category	Core Finding	Primary Target
FI-01	**TIER 1**	Missing Documentary Record	FY 2021/22 ARER Does Not Exist in Any Public Repository	Subpoena DHCS for FY 21/22 ARER receipt confirmation and filed copy.
FI-02	**TIER 1**	Document Authenticity	FY 2017/18 ARER Certified as Complete Six Months Before Fiscal Year Ended	Subpoena DHCS for the FY 17/18 ARER submission timestamp.
FI-03	**TIER 1**	Internal Controls Failure / Conflict of Interest	Rose Bullock Managed Contracts AND Certified Expenditures on Those Same Contracts	Depose Bullock on her dual role.
FI-04	**TIER 1**	Fabricated Justification / Contractor Disappearance	Four Contractors Eliminated With No Documentation; Boilerplate Explanation Written by the Administrator Who Replaced Them	Subpoena RFP distribution list confirming TMS, Lotus, Karuk, and Dunamis were actually invited.
FI-05	**TIER 1**	Retaliatory Procurement / Whistleblower Connection	Procurement Degradation Directly Followed Schlieter's CFRA Leave Request and Whistleblower Activity	Timeline exhibit connecting CFRA request → investigation → RFP degradation → contractor displacement → constructive discharge.
FI-06	**TIER 2**	Filing Delay / Concealment	FY 2020/21 ARER Filed 12 Months Late — Double the Allowable Period	Subpoena DHCS for late filing correspondence.
FI-07	**TIER 2**	Financial Anomaly	Seven Consecutive Years of Zero Medi-Cal FFP Claimed for PEI	Request Medi-Cal cost reports for FY 17/18 through FY 23/24.

ID	Tier	Category	Core Finding	Primary Target
FI-08	**TIER 2**	Financial Anomaly	PEI Spending Increases 75% in One Year Following Degraded Procurement	Request Happy Camp entity formation documents, contract, invoices, and ownership records.
FI-09	**TIER 2**	Concealment of Material Facts	Collard's MHSA Plan Narrative Misrepresents Why Contractors Disappeared	Depose Collard on the basis for her perjury certification.
FI-10	**TIER 2**	Financial Anomaly	$754,785 CSS Program (Telehealth Expansion) Appears Without Planning Document Authorization	PRR for Telehealth Expansion contract, BOS approval, and any MHSOAC or DHCS authorization.
FI-11	**TIER 3**	Financial Anomaly	$1.054 Million Prudent Reserve Drawdown in One Year — No Public Explanation	Request BOS authorization for FY 19/20 Prudent Reserve drawdown.
FI-12	**TIER 3**	Governance Failure	SCRC Paid for Services Before BOS Contract Approval — Nine-Month Gap	Request SCRC invoices dated before March 12, 2024 and any payment records from FY 22/23.

PART 2: THE PATTERN — HOW THE INDICATORS CONNECT

The Sequence of Events

Fraud in government contracting rarely presents as a single transaction. It typically presents as a sequence of control removals followed by financial escalation. The following sequence is documented in Siskiyou County's MHSA record:

Step 1 — Oversight present, controls intact (FY 17/18 through FY 22/23): Samantha Schlieter administers PEI contracting with a rigorous RFA process. Contractors are selected competitively. ARERs are prepared (with anomalies noted in FY 17/18 by Bullock). Expenditures are relatively stable.

Step 2 — Whistleblower disclosure: Schlieter reports to supervisors that Director Collard pressured her to falsify MHSA client and expenditure figures. This is a Labor Code § 1102.5 protected disclosure.

Step 3 — Retaliation begins: Within two days of Schlieter's CFRA leave request, a fabricated sexual harassment investigation is launched. This is the retaliatory adverse action at the center of the lawsuit.

Step 4 — Documentary record is suppressed: The FY 2021/22 ARER — covering the highest-dollar PEI contractor year — goes missing from both the county portal and the BHSOAC state database. It has never been publicly posted.

Step 5 — Accountability mechanisms are dismantled: The 2023 RFP replaces the 2022 RFA. The rubric is removed. The perjury certification is removed. The document shrinks from 25 pages to 9. Bullock co-administers.

Step 6 — Contractor base is replaced: Four contractors totaling $580,732 disappear. Three are dismissed with a single passive phrase written by Bullock. One disappears without explanation. New contractors — including the previously undocumented 'Happy Camp' — appear.

Step 7 — Expenditures escalate: FY 23/24 PEI spending rises 75% to $804,023. The same administrator who ran the procurement certifies these expenditures to the state.

Step 8 — Schlieter is constructively discharged: Having been stripped of her programs, subjected to investigation, and excluded from procurement, Schlieter is constructively discharged on June 12, 2024.

The Control-Removal → Fraud Escalation Pattern

Event / Document	FY 17/18	FY 19/20	FY 20/21	FY 21/22–23/24
Accountability controls (RFA/RFP quality)	HIGH — Schlieter 25-pg RFA, 100-pt rubric, perjury cert	HIGH — maintained under Schlieter	HIGH — Schlieter 2022 RFA re-run	**COLLAPSED — Jauregui/Bullock 9-pg RFP, no rubric, no oath**
Preparer of ARER	**Bullock (primary) — also manages contracts**	Hendricks (Fiscal Tech II) — no contract role	**Bullock — also manages contracts (filed 12 mos late)**	**Bullock (FY 23/24 as Deputy Director) — ran 2023 RFP, certifies its expenditures**
Dunamis in ARER	Not contracted	Not contracted	**Contract approved Oct 2021 — ABSENT from ARER**	**FY 21/22 ARER MISSING; FY 22/23 unconfirmed; FY 23/24 'chose not to contract'**
PEI Medi-Cal FFP claimed	$0	$0	$0	**$0 (despite $303K CSS FFP in FY 23/24)**
Schlieter's oversight role	Active — ran RFA	Active	Active — ran 2022 RFA	**Removed (CFRA/ retaliation) → constructive discharge June 2024**
PEI total expenditure	$513,384	$480,124	$459,261	**$804,023 (FY 23/24) — 75% jump**

PART 3: TIER 1 INDICATORS — INTENTIONAL MISCONDUCT

Tier 1 indicators are those where the evidence is inconsistent with any innocent explanation and is directly supportive of intentional falsification, suppression of records, or retaliation.

FI-01 FY 2021/22 ARER Does Not Exist in Any Public Repository

TIER 1 **MISSING DOCUMENTARY RECORD**

Evidence of Record

- BHSOAC state database shows Siskiyou with 12 filed reports; every comparable-population county (Lassen, Shasta, Tehama, Calaveras) shows 13.
- The county's own archived documents page (siskiyoucounty.gov) contains ARERs for FY 17/18, 18/19, 19/20, and 20/21 — then stops. FY 21/22 is absent.
- FY 21/22 is the first full fiscal year (July 2021–June 2022) in which four PEI contractors were simultaneously active under Schlieter's 2022 RFA: Dunamis ($285,000), TMS ($144,537), Karuk ($73,395), and Lotus ($77,800) — totaling approximately $580,732 in contracted PEI obligations.
- Rose Bullock, who administered those contractor relationships, is the same person who prepared or co-prepared every other ARER in the record.

Implication for Litigation

The mandatory state compliance document covering the single highest-spending PEI contract year simply does not exist publicly. Either (a) it was never prepared — a state reporting violation under Welf. & Inst. Code § 5899 — or (b) it was filed with DHCS but deliberately withheld from public posting. A subpoena to DHCS for receipt logs and the filed document itself will resolve which. If it was never filed, the county is in years-long non-compliance. If it was filed and suppressed, that is a cover-up of a government record.

Documentary Target

Subpoena DHCS for FY 21/22 ARER receipt confirmation and filed copy. Depose Bullock on preparation timeline.

FI-02 FY 2017/18 ARER Certified as Complete Six Months Before Fiscal Year Ended

TIER 1 DOCUMENT AUTHENTICITY

Evidence of Record

- The FY 2017/18 ARER — covering July 1, 2017 through June 30, 2018 — bears a completion date of January 9, 2018.
- The document purports to be a full-year expenditure report. It is not possible to report full-year expenditures on a year that has not yet ended.
- The preparer listed on the document is Rose Bullock (primary), with Anna Powell as co-preparer.
- No other county ARER in the record carries a completion date preceding the fiscal year end.
- DHCS regulations require ARERs to be completed after fiscal year close, based on final audited figures.

Implication for Litigation

A compliance document certifying annual expenditures cannot be completed before the fiscal year ends unless it contains projected or fabricated figures. The January 2018 date on a June 2018 year-end document is either (a) a date field falsification — i.e., the document was backdated to appear timely — or (b) the document was filed with incomplete and estimated figures presented as final. Either constitutes a material misrepresentation to the state. The DHCS submission timestamp, obtainable via subpoena, will show when this document was actually received by the state.

Documentary Target

Subpoena DHCS for the FY 17/18 ARER submission timestamp. Depose Bullock and Powell on the January 2018 date.

FI-03 Rose Bullock Managed Contracts AND Certified Expenditures on Those Same Contracts

TIER 1 INTERNAL CONTROLS FAILURE / CONFLICT OF INTEREST

Evidence of Record

- ARER preparers: Bullock (FY 17/18), Anna Hendricks (FY 18/19, FY 19/20), Bullock (FY 20/21), Bullock as Deputy Director (FY 23/24 state RER).
- Bullock's job titles across these years: Administrative Services Manager (FY 17/18, FY 20/21) → Deputy Director of Administration (FY 23/24). Her email and phone appear on every ARER she prepared.
- In the same capacity, Bullock was the administrative contact for PEI contractor correspondence, invoicing, and payment authorization.
- Bullock is also identified in prior investigation documents as the ARER preparer for FY 21/22 and FY 22/23 — the years that are missing from the public record.
- She co-administered the 2023 RFP with Eric Jauregui, then prepared the ARER certifying expenditures under the contracts awarded through that RFP.

Implication for Litigation

Government contracting standards and MHSA compliance requirements demand segregation of duties: the individual who authorizes payments cannot be the same individual who certifies those payments to the state. Bullock violated this principle in at least three separate fiscal years. In FY 23/24, she certified $804,022 in PEI expenditures — a 75% increase from the last year she prepared — on contracts she helped administer. This is not a paperwork problem; it is the structural condition that makes undetected fraud possible.

Documentary Target

Depose Bullock on her dual role. Request county's written segregation-of-duties policy and whether any exception was documented.

FI-04 Four Contractors Eliminated With No Documentation; Boilerplate Explanation Written by the Administrator Who Replaced Them

TIER 1 FABRICATED JUSTIFICATION / CONTRACTOR DISAPPEARANCE

Evidence of Record

- Four contractors active in FY 22/23 — Dunamis ($285,000 NTE), TMS ($144,537 NTE), Lotus ($77,800 NTE), Karuk Tribe ($73,395 NTE) — do not appear in FY 23/24 contracts.
- The 3-Year Plan FY 2023–26 (p. 12) explains the disappearance of TMS as 'chose not to respond to MHSA PEI

RFP' and Dunamis as 'chose not to contract for these services.' Lotus disappears with no explanation at all.
• No non-renewal letters, no contractor performance evaluations, no BOS termination actions, and no documented outreach confirming these contractors received and declined RFP invitations exist in any publicly available record.
• The 2023 RFP was administered by Eric Jauregui and Rose Bullock — the same individuals whose names appear on the contracts that replaced the departed contractors.
• The 2023 RFP was a 9-page document with no scoring rubric and no perjury certification, contrasting with Schlieter's 25-page 2022 RFA with a 100-point rubric and perjury certification.
• Schlieter was constructively discharged on June 12, 2024 — she ran the 2022 RFA; Jauregui ran the 2023 RFP that eliminated her contractors.

Implication for Litigation

A single passive phrase — 'chose not to respond' — written by the administrator who ran the replacement procurement, eliminates $580,732 in annual contractor obligations and replaces them with new contractors without any documented competitive process accountability. The phrase was not verified, not supported by documentation, and not reviewed by BOS. Combined with the elimination of the perjury certification in the new RFP, this pattern describes an intentional dismantling of accountability mechanisms before eliminating and replacing the contractor base.

Documentary Target

Subpoena RFP distribution list confirming TMS, Lotus, Karuk, and Dunamis were actually invited. Request any written declination from these contractors. Depose Jauregui and Bullock.

FI-05 — Procurement Degradation Directly Followed Schlieter's CFRA Leave Request and Whistleblower Activity

TIER 1

RETALIATORY PROCUREMENT / WHISTLEBLOWER CONNECTION

Evidence of Record

• Samantha Schlieter administered the 2022 RFA — a rigorous 25-page procurement with a 100-point rubric and perjury certification — while employed as a county program coordinator.
• Schlieter requested CFRA leave. Within two days, a fabricated sexual harassment investigation was launched against her.
• Schlieter also reported to supervisors that Director Sarah Collard pressured her to over-report FSP client numbers and inflate PEI expenditure figures in MHSA reporting — a whistleblower disclosure under Labor Code § 1102.5.
• Following Schlieter's departure, the 2023 RFP replaced her procurement framework with a version that eliminated all accountability mechanisms: no rubric, no perjury certification, 9 pages vs. 25.
• The contractors selected under the 2023 RFP displaced the contractors Schlieter had vetted and approved, without documented justification.
• Schlieter was constructively discharged June 12, 2024.

Implication for Litigation

The procurement degradation is not an administrative decision made in isolation. It is sequentially connected to Schlieter's removal. The person with institutional knowledge of proper procurement controls was removed; the procurement controls were then removed; the contractor base was then replaced without accountability documentation. This sequence is consistent with a retaliatory scheme designed to dismantle the oversight structure Schlieter built.

Documentary Target

Timeline exhibit connecting CFRA request → investigation → RFP degradation → contractor displacement → constructive discharge.

PART 4: TIER 2 INDICATORS — MATERIAL FINANCIAL ANOMALIES

Tier 2 indicators require expert financial analysis to establish intent. Each represents a significant departure from expected financial patterns or compliance norms that a forensic accountant or MHSA compliance expert could characterize as anomalous or indicative of misuse.

FI-06 — FY 2020/21 ARER Filed 12 Months Late — Double the Allowable Period

TIER 2

FILING DELAY / CONCEALMENT

Evidence of Record

- The FY 2020/21 ARER covers July 1, 2020 through June 30, 2021. DHCS requires filing by January 1 of the following year — six months post-year-end.
- The document bears a completion date of June 30, 2022 — exactly twelve months after year-end, double the filing deadline.
- The preparer is Rose Bullock.
- This ARER covers the fiscal year immediately preceding Dunamis's contract activation (October 2021). Filing it in June 2022 means it was completed after Dunamis had already been paid for approximately eight months.
- No DHCS non-compliance notice or penalty documentation has been identified in the public record.

Implication for Litigation

The late filing creates a critical sequencing anomaly: the ARER that should have preceded Dunamis's contract award was instead filed eight months into Dunamis's active contract period. Bullock, who administered Dunamis payments, controlled the timing of the document that established the expenditure baseline against which Dunamis activity would be measured. Whether intentional or negligent, the delay served to obscure the transition point.

Documentary Target

Subpoena DHCS for late filing correspondence. Ask Bullock in deposition whether she was aware of the deadline.

FI-07 Seven Consecutive Years of Zero Medi-Cal FFP Claimed for PEI

TIER 2 FINANCIAL ANOMALY

Evidence of Record

- Every available ARER and the FY 23/24 state RER shows $0.00 Medi-Cal Federal Financial Participation (FFP) for PEI — FY 17/18 through FY 23/24.
- In FY 23/24, the county successfully claimed $303,840 in Medi-Cal FFP for CSS, demonstrating institutional knowledge of and capacity to claim federal matching funds.
- PEI programs serving individuals with early mental health symptoms who are Medi-Cal-enrolled are eligible for FFP under federal rules.
- No documentation explains why PEI services that should qualify for federal matching were never billed.

Implication for Litigation

A county that claims federal matching funds for one MHSA component and consistently claims zero for another over seven years, without documentation, presents two possible interpretations: (a) the PEI services were not actually delivered to Medi-Cal-eligible individuals — meaning program deliverables were fabricated — or (b) the county chose not to bill federally so that PEI expenditures would not trigger federal audit scrutiny. Both interpretations are serious. A federal billing pattern analysis by a Medi-Cal compliance expert should be part of the litigation record.

Documentary Target

Request Medi-Cal cost reports for FY 17/18 through FY 23/24. Depose Collard on FFP billing decisions.

FI-08 PEI Spending Increases 75% in One Year Following Degraded Procurement

TIER 2 FINANCIAL ANOMALY

Evidence of Record

- PEI MHSA expenditures: FY 18/19: $533,571 → FY 19/20: $480,124 → FY 20/21: $459,261 → FY 23/24: $804,023.
- The jump from the last documented year ($459,261 in FY 20/21) to FY 23/24 ($804,023) represents a $344,762 increase — 75.1%.
- The increase follows the 2023 RFP in which accountability mechanisms were eliminated.
- New contractor 'Happy Camp' appears for the first time in FY 23/24 across five separate program categories totaling approximately $120,699 — with no documented prior history, no prior ARER mention, and no BOS contract authorization identified in reviewed records.
- The FY 23/24 PEI expenditures were certified by Bullock, who co-administered the procurement that selected these contractors.

Implication for Litigation

A 75% spending escalation following the removal of procurement accountability and oversight controls, certified by the administrator who managed the procurement, is inconsistent with normal program growth. The simultaneous appearance of a previously undocumented contractor (Happy Camp) across five program categories demands immediate investigation into its legal formation, ownership, and relationship to county personnel.

Documentary Target
Request Happy Camp entity formation documents, contract, invoices, and ownership records. Verify against county employee relationship disclosures.

FI-09 Collard's MHSA Plan Narrative Misrepresents Why Contractors Disappeared

TIER 2 | CONCEALMENT OF MATERIAL FACTS

Evidence of Record
- The 3-Year Plan FY 2023–26 (signed by Collard under perjury certification) states that TMS 'chose not to respond' and Dunamis 'chose not to contract.'
- No RFP distribution list has been produced confirming these contractors were invited.
- No written response from TMS, Dunamis, Lotus, or Karuk declining participation has been produced.
- Lotus — a $77,800 contractor — disappears entirely from the discontinued programs section with no explanation.
- The 3-Year Plan FY 2020–23 never mentions Dunamis at all despite a $285,000/year contract being active during its coverage period.

Implication for Litigation
The perjury certification on the 3-Year Plan means Collard certified under oath that its contents were accurate. Claiming contractors 'chose not to respond' without documentation of that choice, while omitting active contractors entirely from plan documents, constitutes a material misrepresentation in a state-certified document. This is directly impeachable at deposition using Collard's own signature.

Documentary Target
Depose Collard on the basis for her perjury certification. Request all communications with TMS, Lotus, Karuk, Dunamis regarding 2023 RFP.

FI-10 $754,785 CSS Program (Telehealth Expansion) Appears Without Planning Document Authorization

TIER 2 | FINANCIAL ANOMALY

Evidence of Record
- The FY 23/24 state RER lists 'Telehealth Expansion' as a CSS program at $557,973 MHSA + $196,812 Medi-Cal FFP = $754,785.
- This is the single largest CSS line item in the FY 23/24 report.
- Telehealth Expansion does not appear in any prior ARER, in the 3-Year Plan FY 2020–23, in the 3-Year Plan FY 2023–26, or in reviewed BOS agenda items.
- MHSA regulations require that program expenditures be consistent with an approved Three-Year Plan or Annual Update.

Implication for Litigation
Spending $754,785 of MHSA funds on a program not authorized in any approved planning document is a per se MHSA compliance violation. The Medi-Cal FFP component ($196,812) suggests federal funds were drawn on a program with no documented state or federal authorization. This requires immediate PRR and, if documents are not produced, a formal DHCS complaint.

Documentary Target
PRR for Telehealth Expansion contract, BOS approval, and any MHSOAC or DHCS authorization. Depose Bullock and Collard.

PART 5: TIER 3 INDICATORS — ENABLING CONDITIONS

Tier 3 indicators are governance and oversight failures that created the conditions for Tier 1 and Tier 2 activity to occur without detection. These are important for establishing systemic rather than incidental misconduct.

FI-11 $1.054 Million Prudent Reserve Drawdown in One Year — No Public Explanation

TIER 3 | FINANCIAL ANOMALY

Evidence of Record

- Prudent Reserve balance: FY 17/18 ending $1,581,670 → FY 18/19 ending $1,747,115 → FY 19/20 ending $692,431.
- The FY 19/20 ARER records a transfer from Prudent Reserve of $1,054,684 ($1,035,699 to CSS + $18,985 to PEI).
- This is the largest single-year reserve drawdown in the available record — 60% of the reserve in one year.
- The year coincides with COVID pandemic disruptions but also with the period identified in other investigation documents as when repayment liability pressure was escalating.
- The FY 19/20 ARER was prepared by Anna Hendricks, a Fiscal Technician II — a non-managerial role unusual for a drawdown of this magnitude.

Implication for Litigation

A $1 million Prudent Reserve drawdown on a county of Siskiyou's size is a major fiscal event. It requires documented authorization and should correlate with program expenditure increases. Yet PEI spending in FY 19/20 ($480,124) declined from FY 18/19 ($533,571). If the reserve was drawn to cover non-program costs or to obscure a funding shortfall related to the repayment liability, that is misuse of MHSA funds.

Documentary Target

Request BOS authorization for FY 19/20 Prudent Reserve drawdown. Cross-reference with repayment liability timeline.

FI-12 SCRC Paid for Services Before BOS Contract Approval — Nine-Month Gap

TIER 3 **GOVERNANCE FAILURE**

Evidence of Record

- Siskiyou Community Resource Center (SCRC) appears in the Annual Update FY 22/23 as a funded PEI contractor at $659,374 (CSS allocation).
- SCRC's BOS contract approval did not occur until March 12, 2024 — placed on consent calendar with no discussion.
- The period of service (FY 22/23) predated the formal contract by approximately nine months.
- The March 12, 2024 consent calendar item also included approval of $1.93 million to NVCSS — a CSS contractor — also with no BOS discussion.
- The Jeramie Foster v. Siskiyou County case (Case No. 24CV2298) went to closed session at the same March 12, 2024 meeting.

Implication for Litigation

Paying a contractor without a valid executed contract is a County contracting violation and, for MHSA funds, potentially a state compliance violation. The retroactive consent calendar approval — with no BOS discussion — suggests the contract was never properly authorized before services began. Combined with the timing (same meeting as a related employment lawsuit in closed session), the consent approval warrants scrutiny as a possible retroactive legitimization of payments already made.

Documentary Target

Request SCRC invoices dated before March 12, 2024 and any payment records from FY 22/23. Depose Collard and Bullock on SCRC authorization.

PART 6: PRIORITY DISCOVERY AND INVESTIGATION ACTIONS

Pri.	Type	Target Document / Action	Why It Matters
1	Subpoena DHCS	FY 2021/22 ARER — submission date and filed copy	Resolves whether the document was ever filed. If not, establishes non-compliance. If filed and differs from public record, establishes falsification.
2	Subpoena DHCS	FY 2017/18 ARER — submission timestamp	Confirms whether the January 9, 2018 completion date was the actual filing date or was backdated.

Pri.	Type	Target Document / Action	Why It Matters
3	PRR + Subpoena	RFP distribution list confirming TMS, Lotus, Karuk, Dunamis were invited to 2023 RFP	If these contractors were not invited, the 'chose not to respond' narrative in the Plan is fabricated.
4	PRR	Dunamis contract, invoices, and payment records FY 21/22 and FY 22/23	The only two years Dunamis was active have no ARER. Invoice/payment records will show what was actually paid.
5	PRR + Subpoena	Happy Camp entity records: incorporation, ownership, and relationship to county personnel	A $120K contractor with no prior history appearing across five categories after accountability controls were removed warrants conflict-of-interest investigation.
6	PRR	Telehealth Expansion contract, BOS approval, MHSOAC authorization	$754,785 program with no planning document authorization — possible unilateral fund diversion.
7	Subpoena DHCS	Medi-Cal cost reports FY 17/18 through FY 23/24	Determines whether PEI services were actually billed and whether beneficiary records support claimed service delivery.
8	PRR	Prudent Reserve drawdown authorization for FY 19/20 ($1.054M)	A $1M reserve drawdown with no corresponding PEI spending increase requires documented justification.
9	Deposition	Rose Bullock — all topics above	Bullock is the central figure in every financial anomaly and documentation gap identified.
10	Deposition	Sarah Collard — perjury certifications, Dunamis, contractor narrative	Collard signed under perjury every plan document misrepresenting contractor activity.

PART 7: NOTES ON EXPERT WITNESS NEEDS

Forensic Accountant

The financial anomalies in this case — the PEI spending escalation, the missing Medi-Cal FFP, the Prudent Reserve drawdown, and the unauthorized Telehealth Expansion — require a forensic accountant with MHSA or government contract experience. The expert should be retained to: (1) reconstruct actual PEI expenditures for FY 21/22 and FY 22/23 from invoice and payment records, (2) opine on whether the financial pattern is consistent with fraud or misappropriation, and (3) calculate any damages resulting from inflated or unauthorized expenditures.

MHSA Compliance Expert

The regulatory violations embedded in this record — the missing ARER, the late filing, the lack of Medi-Cal FFP billing, the unplanned program expenditures — require an expert in MHSA compliance regulations (Welf. & Inst. Code § 5890 et seq., Cal. Code Regs. tit. 9 §§ 3500–3830). This expert should opine on the county's compliance failures and their legal consequences, including potential state repayment obligations.

Government Procurement Expert

The degradation of the RFP — from Schlieter's 25-page rigorous process to Jauregui's 9-page stripped-down version — requires an expert who can testify about standard government procurement controls and the significance of removing a perjury certification, a scoring rubric, and performance documentation requirements from a publicly funded contracting process.